IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FT. WORTH DIVISION

ROBERT (BOB) ROSS	§	
Plaintiff/Counterclaim-Defendant,	§	
	§	
	§	
	§	
	§	
	§	Case No. 4:22-CV-00343-Y
	§	
V.	§	
	§	
ASSOCIATION OF PROFESSIONAL	§	
FLIGHT ATTENDANTS,	§	
MCGAUGHEY, REBER AND	§	
ASSOCIATES, INC., JULIE	§	
HEDRICK,-ERIK HARRIS	§	
Defendants.	§	

PLAINTIFF/COUNTERCLAIM DEFENDANT'S MOTION TO EXTEND TIME TO FILE RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Plaintiff/Counterclaim-Defendant Robert "Bob" Ross hereby moves for a twenty-one day extension on time in which to file a response to Defendants' motion for summary judgment in the subject case. This is the plaintiff/counterclaim-defendant's first for extension of time on this matter. Should this motion to extend time to respond be granted, the due date for filing a response will be set at November 1, 2022.

Substantial progress has been made by the plaintiff/counterclaim-defendant on preparation of its summary judgment response materials. At this writing, a draft had been nearly completed based on counsels' notes of preliminary research and interviews given the early nature of the developments of this suit and the fact that discovery has not commenced.

During drafting, Plaintiff/Counterclaim-Defendant's counsel, Heather Abreu's son fell ill to a severe asthma attack causing her son to be rushed to the emergency room for acute care. Counsel has been tending to her child. As a result, more time is necessary finish the response.

While plaintiff/counterclaim-defendant intends to expeditiously work toward completion of a response to defendants' summary judgment motion and supporting materials, the undersigned is committed to drafting a response in the related matter also pending with this court and due at the same date. Accordingly, a full twenty-one-day extension will be needed.

For the forgoing reasons, it is respectfully requested that this motion for an extension of time of twenty-one days for plaintiff/counterclaim-defendant to file a response to a motion for summary judgment, up to and including November 1, 2022, be granted.

Respectfully submitted, KD PHILLIPS LAW FIRM, PLLC

By: /s/ Kerri Phillips_____

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ATTORNEYS FOR PLAINTIFF/COUNTERCLAIM-DEFENDANT

Certificate of Conference

I emailed Sanford Denison, William Osbourne and Michael Rake, attorneys for defendants on October 5, 2022 to discuss the filing of this motion. None of the attorneys responded to the email regarding the filing of this motion.

/s/ Kerri Phillips Kerri Phillips, Esq.

Certificate of Service

I certify that on this 5th day of October 2022, a true and correct copy of the foregoing document was sent to all counsels of record, hereunder listed via ECF Filing as permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure.

William Osborne Sanford Denison Michael Rake

/s/ Kerri Phillips
Kerri Phillips, Esq.

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ASSOCIATES, INC., JULIE	§	
HEDRICK, ERIK HARRIS	§	
Defendants/Counterclaim-Plaintiffs.	§	

ORDER GRANTING EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

This Matter, having come before the Court on Plaintiff/Counterclaim-Defendant, Robert (Bob) Ross's Motion to Extend Time to File Response to Defendants' Motion for Summary Judgment should be granted for good cause shown, it is hereby:

ORDERED, ADJUDGED, AND DECREED that the Plaintiff/Counter-Defendant's Motion for Extension of Time to File Response to Defendants' Motion for Summary Judgment is GRANTED thereby extending the deadline to respond by twenty-one days to November 1, 2022.

ENTERED THIS	_ day of		_, 2022.	
		IIIDGE PRES	SIDING	 _